

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION**

This document relates to:

*Jennifer Artz, et al. v. Endo Health Solutions Inc., et al.*

Case No. 1:19-OP-45459

*Michelle Frost v. Endo Health Solutions Inc. et al.*

Case No. 1:18-OP-46327

*Salmons v. Purdue Pharma L.P., et al.*

Case No. 1:18-OP-45268

**MDL No. 2804**

**Case No. 17-md-2804**

**Judge Dan Aaron Polster**

**DEFENDANTS' MOTION TO FILE UNDER SEAL OPPOSITION TO  
NAS PLAINTIFFS' MOTION FOR RECONSIDERATION**

Defendants respectfully move this Court for leave to file under seal unredacted versions of their Opposition to NAS Plaintiffs' Motion for Reconsideration.<sup>1</sup> The Opposition discusses confidential personal and medical information related to Plaintiffs and their minor children, and the Court has previously kept this information sealed to protect the privacy of those individuals. Plaintiffs have requested that the information at issue continue to be kept confidential and filed under seal.

Accordingly, Defendants request that the Court grant permission for Defendants to file an unredacted version of the Opposition under seal.

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<sup>1</sup> Several defendants named in this litigation are not subject to the Court's personal jurisdiction. This motion is filed subject to and without waiving all defenses, including but not limited to lack of personal jurisdiction, failure of service of process, and ineffective service of process.

February 26, 2021

Respectfully Submitted,

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